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Attorneys for Defendant
CRANE CO.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

VC

BARRY KELLY and MOLLY KELLY,,

Plaintiffs,

vs.

CBS CORPORATION, et al.,

Defendants.

Case No. 11-cv-03240-~~CRB~~ (JSC)

**STIPULATION AND ~~[PROPOSED]~~
ORDER, CONTINGENT ON COURT
APPROVAL, TO EXTEND THE FACT
DISCOVERY CUTOFF FOR THE SOLE
PURPOSES OF DEPOSING CRANE CO.'S
PERSON MOST KNOWLEDGEABLE**

HERE NOW COMES Plaintiffs and Defendants, by and through their respective attorneys of record, and do hereby enter into the following stipulation to extend the fact discovery cutoff for the sole purpose of allowing plaintiffs to take the deposition of defendant Crane Co.'s Person Most Knowledgeable based on the following good cause:

On January 13, 2015, the Court issued a minute order setting March 16, 2015 as the discovery cutoff. (Document 43).

Plaintiffs timely requested that defendant Crane Co. provide a date and location for the deposition of its Person Most Knowledgeable.

Crane Co. informed Plaintiffs that its Person Most Knowledgeable is unable to sit for a deposition until March 17, 2015, and Crane Co. has agreed to produce its Person Most Knowledgeable at a location to be determined by mutual agreement, for deposition in-person, by telephone, or by video conference on that date.

1 PLAINTIFFS AND DEFENDANTS DO HEREBY STIPULATE that, contingent upon
2 approval of the Court, the discovery cutoff shall be continued, solely for the purpose of allowing
3 plaintiffs to take the deposition of Crane Co.'s Person Most Knowledgeable, until March 17, 2015, or
4 until the conclusion of the deposition, whichever is later.

5 All other scheduling order dates will remain the same, including those set forth in Judge
6 Chhabria's January 13, 2015 Order, Document (43).

7 IT IS SO STIPULATED.

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9 **K&L GATES LLP**

10 Dated: February 17, 2015

11 By: PES
Peter E. Seskin
Attorneys for Defendant Crane Co.

12 **BRAYTON PURCELL LLP**

13
14 Dated: February 17, 2015

15 By: KC
Kimberly Chu
Attorneys for Plaintiffs

16
17 **FOLEY & MANSFIELD LLP**

18 Dated: February 17, 2015

19 By: /s/ Elizabeth Bain
Gary D. Sharp
Elizabeth R. Bain
Attorneys for Defendant Cleaver-Brooks, Inc.

20
21 **YARON & ASSOCIATES**

22
23 Dated: February 17, 2015

24 By: /s/ D. David Steel
George D. Yaron
D. David Steele
Attorneys for Defendant Puget Sound
Commerce Center, Inc. (fka Todd Shipyards
Corporation)

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~~[PROPOSED]~~ ORDER

PURSUANT TO STIPULATION, the discovery cutoff in this matter shall be continued, solely for the purpose of allowing plaintiffs to take the deposition of Crane Co.'s Person Most Knowledgeable, until March 17, 2015, or the conclusion of the deposition, whichever is later.

Dated: February 18, 2015



Honorable Vince Chhabria